

1 Q59. Does FairPoint have any contingency plans to address potential risks associated
2 with either technical difficulties or some sort of failures in terms of the conversion
3 process or cutover process?

4 A59. (By Mr. Haga) We are in the process of developing contingency plans. With any
5 conversion, a risk of error exists. However, we plan to use the first two data
6 extract processes to obtain an understanding of the type of manual efforts that will
7 have to be in place for correcting information (if the need arises) and for adding
8 information which requires manual input. (See the Rebuttal Testimony of
9 Stephen E. Smith on behalf of Verizon for further explanation of the data extract).
10 With respect to the August 31 (2007) and January 30 (2008) data extracts, the
11 plan is to identify the amount of additional support that will be needed once the
12 conversion occurs. This will help us to again mitigate the risk post-conversion in
13 the event any issues develop.

14 (By Mr. Kurtze) The primary mitigation technique is effective testing before
15 cutover and we will have a very comprehensive test strategy. Years of data will
16 work its way through the testing. Testing will occur at the level of individual
17 applications as well as at the level of groups of applications. End-to-end testing
18 and then load testing will follow. Finally, critical user acceptance testing will
19 occur.